

United States District Court of Maryland

101 W. Lombard Street

Baltimore, MD 21201

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

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CLERK'S OFFICE  
AT BALTIMORE

Case No.: No. RDB-19-787

BY \_\_\_\_\_ DEPUTY

Complaint: Unequal terms and conditions of my employment, retaliation and unsafe work environment.

Adria M. Crump

211 Garden Ridge Road

Apt. B

Catonsville, MD 21228

Plaintiff

vs.

Vinifera Distributing of Maryland

3630 commerce Drive

Ste. 105

Baltimore, MD 21227

Defendant

**Complaint:**

1. I was hired mid-July 2017 and I conducted a physical inventory of the warehouse, which had discrepancies from the prior month as well as the end of the month of July with more discrepancies. I was told by the sales manager John Fusciello, that the inventory would never come out accurate and each month I was there, it never did.
2. I informed corporate office (Anna) regarding my concerns after several months passed with discrepancies every month regarding inventory, concerns regarding employee Johns Langlois, I also made her and Preston aware of the statement John Fusciello made regarding inventory. Anna said that that responsibility fell on me, so I reminded John Langlois of the policy and procedures, which he continued to ignore. I also corresponded the Preston, who is the trainer and he also concurred.

3. John Langlois asked me why I use a cane, then on 2 separate occasions tried to compromise my stability in the warehouse, while I did not use my cane while working.
4. I disciplined John Langlois per corporate office (Anna) on 4 occasions: 8/24, 9/1, 10/6 and 10/24 after he continued to not follow policy and procedures. He spoke to John Fusciello regarding the write ups and John Fusciello blamed me for trying to fire John Langlois as John Fusciello would continue to make excuses for John Langlois.
5. I also conversed with John Fusciello regarding John Langlois continuous mess ups and he would continue to make excuses for John Langlois. I spoke with Preston and Anna, they already knew what was going on in this office as John Fusciello had previous difficulty with the prior Office Coordinator, who he fired.
6. I was fired on November 1<sup>st</sup> for being disruptive and unable to work with coworkers by John Fusciello, when in fact I was fired for doing my job with integrity, with accuracy and reporting facts that compromised my job to the appropriate persons who were aware of my concerns and never did anything regarding my concerns or write ups. He also mentioned to contact my Senators office before I left the office on November 1<sup>st</sup>.
7. After speaking with Mr. Mutale Matambo from Elijah Cummings office he suggested I file an EEOC case and I did.

**Seeking damage amount:**

Exceeding \$75,000

3/21/19

Date

Adria M. Crump

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